

US EPA ARCHIVE DOCUMENT

## **MEMORANDUM**

**SUBJECT:** EPA Comments on “Dam Safety Assessment of CCW Impoundments; Hunter Power Plant; Castle Dale, Utah”

**DATE:** September 25,

1. Section 2.2, each of the five impoundments is rated as Low Hazard potential. None of the impoundments stores ash and therefore should not have been given a hazard potential rating. Please retain the information regarding the state rating, however.
2. In Section 2.1.3, it may be advantageous to include a brief explanation as to why the facility was initially considered for assessment:

“In EPA’s initial request for information on March 14, 2012, it was explained by plant personnel Evaporation Pond 1 and Evaporation Pond 2 received “boiler blowdown, bottom ash from Boiler Unit 3, stormwater drainage, sewer drainage, and water treatment regen water. The sluicing of bottom ash would warrant assessment based on EPA’s scope for the CCR Dam Assessment effort. However, upon assessment, it was explained by plant personnel that the units did not receive bottom ash.”

**From:** [David Marble](#)  
**To:** [Englander, Jana](#)  
**Subject:** Re: FW: Comment Request on Coal Ash Site Assessment Round 12 Draft Report - PacifiCorp - Hunter Power Plant  
**Date:** Thursday, October 17, 2013 2:18:34 PM

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Jana,

Thanks for the opportunity to review the referenced report. I have completed my review and do not have any comments.

David Marble, P.E.  
Utah Dam Safety

On Mon, Sep 30, 2013 at 1:23 PM, Englander, Jana <[Englander.Jana@epa.gov](mailto:Englander.Jana@epa.gov)> wrote:

Dear All,

We would like to offer Utah and EPA Region 8 an opportunity to comment on the Draft Assessment Report on the Coal Combustion Residual Impoundment(s) located at the facility below. You can access the report by following the link below. Please let me know if you intend to comment or have any questions. Comments would be appreciated within 30 calendar days of receipt of this email. Thank you!

Regards,

Jana

**Jana Englander**

Office of Resource Conservation and Recovery,

Materials Recovery Waste Management Division

Energy Recovery and Waste Disposal Branch

U.S. Environmental Protection Agency

[703-308-8711](tel:703-308-8711)

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**From:** Englander, Jana  
**Sent:** Monday, September 30, 2013 3:11 PM  
**To:** 'Laren.Huntsman@PacifiCorp.com'; 'Brett.Shakespear@PacifiCorp.com'; 'Michael.Jenkins@PacifiCorp.com'  
**Cc:** Hoffman, Stephen; Dufficy, Craig; Kelly, PatrickM; Englander, Jana  
**Subject:** Comment Request on Coal Ash Site Assessment Round 12 Draft Report - PacifiCorp - Hunter Power Plant

Dear Mr. Huntsman,

The draft assessment report for PacifiCorp - Hunter Power Plant is ready for review. EPA would appreciate it if you would review and submit your comments on this report to us within 30 calendar days of receipt of this email. **Please confirm receipt of this email and send your comments to:**

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)

1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 South Crystal Drive  
5th Floor, N-5237  
Arlington, VA 22202-2733

You may also provide your comments by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov) and [englander.jana@epa.gov](mailto:englander.jana@epa.gov).

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

The draft report can be accessed at the secured link below. The secured link will expire on November 15, 2013.

Here is the link for the report:

<http://www.hightail.com/download/OGhkeFVWT01Fc0s1eDhUQw>

Please let me know if you have trouble accessing the reports or have any questions/requests.

Respectfully,

Jana Englander

**Jana Englander**

Office of Resource Conservation and Recovery,

Materials Recovery Waste Management Division

Energy Recovery and Waste Disposal Branch

U.S. Environmental Protection Agency

[703-308-8711](tel:703-308-8711)

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David K. Marble, P.E.  
Assistant Utah State Engineer / Dam Safety  
801-538-7376



*Hunter Plant*  
2 miles south Highway 10  
P. O. Box 569  
Castle Dale, Utah 84513

October 22, 2013

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 South Crystal Drive  
5th Floor, N-5237  
Arlington, VA 22202-2733

Subject: PacifiCorp comments regarding the preliminary Dam Safety Assessment of CCW Impoundments at PacifiCorp Energy Hunter Facility

To Whom It May Concern:

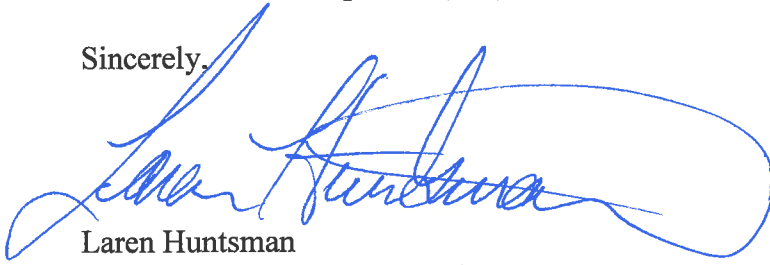
On September 30, 2013, PacifiCorp Energy received a request to review and comment on the Dam Safety Assessment of CCW Impoundments preliminary report for the PacifiCorp Energy Hunter Facility. The site assessment was conducted on September 13, 2012, by EPA's contractor O'Brien & Gere to evaluate the safety of any coal combustion waste impoundments at the plant. The attached comments constitute PacifiCorp's response to the content, specific findings, and recommendations within the draft report.

PacifiCorp agrees with EPA's assessment which states that CCW materials at the Hunter Power Plant are not being managed in surface impoundments or similar diked or bermed management units or management units designated as landfills that receive liquid-borne material. EPA's findings are consistent with PacifiCorp's own internal assessment conducted prior to EPA's site visit. No areas of concern were noted at the Hunter facility.

PacifiCorp is conducting additional geotechnical studies, and in conjunction with the recommendations provided by EPA's site assessment, is implementing comprehensive inspection procedures as necessary. PacifiCorp is committed to responsible environmental stewardship and safety at each of its facilities.

If you require further clarification of the information contained in the attached document, please contact Brett Shakespear at (801) 220-2575, or via email at [Brett.Shakespear@PacifiCorp.com](mailto:Brett.Shakespear@PacifiCorp.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Laren Huntsman", with a large, sweeping flourish extending to the right.

Laren Huntsman  
Managing Director, Hunter Plant

Enclosure

## **PacifiCorp Response to Draft Report**

### **3.3 Operator Interviews**

The second sentence on page 7 refers to the incorrect facility (Reid/HMPL Ash Pond and the Green Ash Pond). It should refer to the PacifiCorp Hunter Power Plant.